## CITY OF MONTEREY PARK

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**September 13, 2019** 

Honorable Peggy Huang Regional Housing Needs Assessment Subcommittee Southern California Association of Governments 900 Wilshire Boulevard, Suite 1700 Los Angeles, California 90017

Subject: Regional Housing Needs Assessment (RHNA) Methodology

Dear RHNA Subcommittee Chair Huang:

Thank you for providing the opportunity to comment on the three proposed RHNA allocation methodologies.

First, the City of Monterey Park supports the Regional Council's action to object to the State Department of Housing and Community Development's (HCD) regional determination for the SGAC region of 1,344,740, which does not make sense; considering that HCD's calculation of the regional determination did not use SCAG's population forecast, nor reasonably apply the methodology and assumptions to calculate the regional determination.

Second, the City of Monterey Park requests that the final methodology use local input as the foundation of the methodology that will be adopted, acknowledge existing growth constraints, and acknowledge the role of local governments in constructing housing. While there are concerns with all three proposed methodologies, the City of Monterey Park is more favorable to Option 3, which appears to provide local agencies with greater local control and presents less severe impacts to the local agencies. Local input is significant to this review process because local agencies have a real-world perspective of local housing opportunities and constraints at an individual, jurisdictional level. Local input links the RHNA to other strategic plans in identifying areas within the region sufficient to house an eight-year projection of the regional housing need. The City of Monterey Park supports the bottom-up approach SCAG used to derive local input over a year long process in which SCAG solicited input from all the local jurisdictions on population, housing and employment for 2016-2045;

parcel level General Plan land uses, existing 2016 land uses, and zoning; and the extensive surveys collecting information on policies and best practices incorporated into local planning.

Lastly, given the significant repercussions for cities and counties to site the units allocated, it is important to that the process results in a distribution that is achievable. Thus, an allocation approach that emphasizes the factors that are critical for agencies being able to achieve the allocated housing units should be heavily-weighted in one or more or the alternatives.

Should you have any questions, please do not hesitate to contact my City Planner, Mark McAvoy, at 626.307.1320 or at mmcavoy@montereypark.ca.gov.

Sincerely,

Ron Bow City Manager

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